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Mayor Brian J. Lawler

City Hall, New Bedford, MA 02740

617/999-2931

January 3, 1984

16 JAN 1984

U.S. Environmental Protection Agency
John F. Kennedy Federal Building
Room 2103
Water Management Division
Boston, MA 02203

Attention: Permits Compliance Section
Mr. Brian Pitt

Dear Mr. Pitt:

In response to your letter of December 16, 1983 regarding periodic overflows from the New Bedford Wastewater Collection system into the Acushnet River in the vicinity of the Belleville Avenue Pumping Station, we have prepared the following report in accordance with General Condition 17 of NPDES, Permit #MA 0100781:

a) The cause of the by-pass. The causes of periodic overflows in the vicinity of the Belleville Avenue Pumping Station relate to a combination of circumstances; interceptor collapse, interceptor grit buildup and the combined sewer system.

As you are aware, the Belleville Avenue Pumping Station is presently undergoing extensive renovations designed to update antiquated facilities as well as minimize the frequency of overflows into the Acushnet River. During the early steps of by-pass pumping the downstream interceptor experienced a collapse. The collapse of the downstream interceptor resulted in a temporary overflow of wastewater into the Acushnet River. Once the collapsed interceptor was repaired, the by-pass pumping station still could not convey all of the flows entering the by-pass pumping station because of excessive buildup of grit found to exist in the downstream receiving interceptor. The overflow condition was further complicated during storm events because of the increased volume of flow leaving the by-pass pumping station.

b) A description of the by-pass flow including its inspection upon the receiving waters. During the interceptor collapse, all flows reaching the by-pass pumping station overflowed untreated into the Acushnet River. Subsequent to the repair of the collapsed downstream interceptor only flows in excess of the downstream interceptor capacity were overflowed. From November 23 any overflows were chlorinated in accordance with DEQE's recommendations.

In view of the existence of the downstream interceptor restriction prior to the Initiation of renovations the recent chlorinated overflows should have less of an impact on the receiving waters than the raw overflows that occurred prior to the construction of the Belleville Avenue renovations. While the Acushnet River is classified S.B. in the vicinity of the Belleville Avenue Pumping Station, the river is understood to be grossly contaminated with PCBs. Although there is no excuse for unnecessary wastewater overflows into the Acushnet River, the impact on the receiving waters is obvious.

c) The date the by-pass started, the estimated amount of flow discharged and the anticipated time the by-pass is expected to continue. Overflows at that location were observed to occur on November 22, 1983 with a number of additional overflows occurring in late November during peak flows. Subsequently, the city constructed a manhole over the downstream interceptor and began dragging operations to recude and eliminate the downstream pass restriction. On November 23 the city initiated a program of overflow chlorination in accordance with DEQE's recommendations. The frequency of overflows has since been drastically reduced.

Unfortunately, the exact amount of flow overflowed was not determined at the time. At present only peak flows and all storm events cause any type of overflow into the Acushnet River. Since the dragging operation is presently "on-going" by city forces and the frequency of overflows during peak overflow periods is continuously decreasing, it is very difficult to estimate the anticipated time that periodic overflows are expected to continue.

d) All steps taken to reduce and eliminate the by-pass. The city intends to continue cleaning the downstream interceptor since its capacity will be necessary for successful operation of the renovated Belleville Avenue Pumping Station. The city is also endeavoring to complete construction of the Belleville Avenue Pumping Station as expeditiously as possible. All during this period the city will continue chlorination of any overflows that occur.

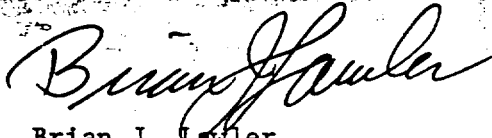
e) Steps taken by the permittee to prevent recurrence of the by-pass. Continuation of downstream interceptor cleaning, completion of the Belleville Avenue Pumping Station, construction and maintenance of the downstream interceptor in future years.

I trust that this report and the enclosed correspondence from DPW Commissioner Robert Couto regarding this situation will adequately address all issues raised in your recent letter. If you have further questions about the subject, please feel free to contact me, Mr. Couto or Camp, Dresser & McKee.

As you know, the City of New Bedford has made significant progress over the past nine months to improve its wastewater treatment system and the City has every intention of continuing along this path. We are committed to maintaining an efficient wastewater treatment system which protects our residents and our environment.

We stand ready to cooperate with you and your agency wherever possible to make this goal a reality.

Very truly,

A handwritten signature in cursive script, appearing to read "Brian J. Lawler".

Brian J. Lawler
Mayor

BJL/bas

Enclosures

cc: Robert Couto, DPW
Robert Cutone, CDM
Brian Jeans, DEQE